

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

IN RE:

CHRISTOPHER LEITCH  
AKA CHRIS LEITCH  
Debtor

Case No. No.: 21-11601-KHK  
Chapter 13

**OBJECTION OF SILVIA LEITCH TO PROPOSED CHAPTER 13 PLAN AND  
OBJECTION TO CONFIRMATION OF PLAN**

Silvia Leitch, a secured creditor in the above-entitled Bankruptcy proceeding, objects to the confirmation of the Plan proposed by the Debtor as follows:

1. Ms. Leitch is a secured creditor of the Debtor, being both a beneficiary of a Deed of Trust on property commonly known as 14068 Randolph Court, Woodbridge VA 22193 in the amount of \$34,943.44 (Debt 1), and as the holder of a judgment against the Debtor entered by the Circuit Court of Prince William County on July 30, 2021 in the amount of \$46,000 (Debt 2).

2. The full amount of Debt 1 is presently due and payable.

3. The Debtor is well aware that Debt 1 is secured yet claimed in his Schedules that the Debt is unsecured.

4. The Debtor is well aware that Debt 1 is to a former spouse and was incurred by the Debtor in connection with a separation agreement and divorce decree, and thus is not dischargeable.

5. The Debtor is well aware that Debt 1 is the result of a separation agreement between the parties incorporated by a decree of divorce which is non-appealable and thus is not subject to dispute.

6. The proposed Plan does not set forth a reasonable schedule and time period for the payment of Debt 1.

7. Debtor does not even disclose the existence of Debt 2 in his Schedules, much less provide for its payment in his proposed Plan.

8. The full amount of Debt 2 is presently due and payable.

9. The Debtor is well aware that Debt 2 is to a former spouse and was incurred by the Debtor in connection with a divorce decree, and thus is not dischargeable.

10. The Debtor is well aware that Debt 2 was incurred in the divorce proceedings for the purposes of procuring spousal and child support and thus is not dischargeable.

11. The Debtor's Schedules are neither accurate nor complete.

12. The proposed Chapter 13 plan does not provide this objecting secured creditor with adequate protection or adequate security, according to Sections 362 and 1325(a) of the Code.

13. The Plan is not feasible.

14. The Plan does not propose to pay Ms. Leitch's entire claim despite the same being non-dischargeable.

15. Any Chapter 13 Plan proposed by Debtor must provide for immediate payment in full of the amounts due to Ms. Leitch, eliminate the objections specified above in order to be feasible, and provide adequate protection to this objecting secured creditor. It is respectfully requested that confirmation of the Chapter 13 Plan as proposed by Debtor be denied.

WHEREFORE, Silvia Leitch, a secured creditor prays as follows:

1. That confirmation of the proposed Chapter 13 Plan be denied.
2. For attorney's fees and costs incurred herein.
3. That a hearing be held 11/18/2021, 01:30 PM, Judge Kindred's Courtroom, 200 S.

Washington Street, 3rd Floor, Courtroom III, Alexandria, VA, on this objection; however, the hearing shall be conducted pursuant to Standing Order 21-12.

4. For such other relief as this Court deems proper.

**SILVIA M. LEITCH,**  
**Creditor**

**VAUGHN LAW FIRM PLC**  
1433 New Monrovia Road  
Colonial Beach, Virginia 22443  
(703) 689-2100 Telephone  
[rvaughn@oconnorandvaughn.com](mailto:rvaughn@oconnorandvaughn.com)

By /s/Robert L. Vaughn, Jr.  
Robert L. Vaughn, Jr., VSB 20633  
*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that on this 27<sup>th</sup> day of October, 2021, the following person(s) were or will be served a copy of the foregoing Objections via the CM/ECF system:

Thomas P. Gorman, Trustee  
300 N. Washington St. Ste. 400  
Alexandria, VA 22314

Christina T. Parrish, Esq.  
12934 Harbor Drive, Suite 107  
Woodbridge, VA 22192

Christopher Leitch aka Chris Leitch  
4655 Whitaker Place Woodbridge, VA 22193

Matthew C. Rawls, Esq.  
BWW Law Group, LLC  
8100 Three Chopt Rd. Suite 240  
Richmond, VA 23229

Mary F. Balthasar Lake, Esquire  
LOGS Legal Group LLP  
10021 Balls Ford Road, Suite 200  
Manassas, VA 20109

/s/Robert L. Vaughn, Jr.  
Robert L. Vaughn, Jr.